

Magistrate Judge S. Kate Vaughan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
KEITH DANIEL FREERKSEN,  
  
Defendant.

NO. MJ24-183  
COMPLAINT for VIOLATION  
Title 18, United States Code,  
Sections 2423(b)

BEFORE the Honorable S. Kate Vaughan, United States Magistrate Judge,  
United States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Travel with Intent to Engage in a Sexual Act with a Minor)**

On or about January 5, 2024, in Skagit County, within the Western District of Washington, and elsewhere, the defendant, KEITH DANIEL FREERKSEN, did knowingly travel in interstate commerce, to wit from South Haven Township, Michigan, to Mount Vernon, Washington, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined in 18 U.S.C. § 2246, with a person under the age of eighteen, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Section 2423(b).

1 And the Complainant states that this Complaint is based on the following information:  
2 I, Sara Blond, being first duly sworn on oath, depose and say:

3 **I. INTRODUCTION**

4 1. I am a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”)  
5 and have been so employed since 2009. I am a law enforcement officer of the United States,  
6 within the meaning of Title 18, United States Code, who is empowered by law to conduct  
7 investigations of, and to make arrests for offenses enumerated in Title 18, United States  
8 Code.

9 2. I am assigned to the Everett and Bellingham Resident Agencies of the Seattle  
10 Field Office, where I specialize in Violent Crimes Against Children and Human Trafficking  
11 investigations occurring in Snohomish, Skagit, Whatcom, Island, and San Juan counties,  
12 which are situated in the Western District of Washington. I am assigned to the Crimes  
13 Against Children & Human Trafficking Task Force, which includes the online sexual  
14 exploitation of children involving the transmission, possession and production of child  
15 pornography, exploitation of children on the internet, and other federal criminal activity.  
16 During my career as an FBI Special Agent, I have served as the case agent in numerous child  
17 exploitation investigations. I have participated in all aspects of child exploitation  
18 investigations, including conducting surveillance, undercover operations, identifying victims,  
19 interviewing suspects, and executing arrest and search warrants. In 2015, I underwent  
20 specialized training facilitated by the FBI. I successfully completed coursework to become a  
21 Digital Evidence Extraction Technician, as authorized by the FBI’s Computer Analysis and  
22 Response Team. In this capacity, I have specialized training in computer forensics, which  
23 involves the search, seizure, and extraction of digital evidence; this requires on-going  
24 mandatory training on an annual or semi-annual basis. I have worked as the case agent on  
25 numerous investigations involving child pornography, serving as the affiant on search  
26 warrants, complaints, and arrest warrants.

27 3. As further detailed below, based on my investigation and the investigation of  
28 other law enforcement officers, I believe there is probable cause to conclude that KEITH

1 DANIEL FREERKSEN has committed the offense charged in this complaint namely, Travel  
2 with the Intent to Engage in a Sexual Act with a Minor in violation of 18 U.S.C. § 2423(b).

3 4. The information contained in this affidavit consists of my personal knowledge  
4 gained through this investigation, information provided by other law enforcement agencies  
5 involved in this investigation, information provided by witnesses and others with knowledge  
6 of the relevant events and circumstances, information gleaned from my review of evidence,  
7 and my training and experience. Because this affidavit is offered for the limited purpose of  
8 establishing probable cause, I list only those facts that I believe are necessary to support such  
9 a finding. I do not purport to list every fact known to me or others as a result of this  
10 investigation.

## 11 II. SUMMARY OF INVESTIGATION

12 5. On or about January 16, 2024, Detective Elizabeth Paul with the Mount  
13 Vernon Police Department (MVPD) called me. Det. Paul told me she was assigned a  
14 missing persons investigation into Minor Victim, a fourteen-year-old girl, who ran away  
15 from home on January 5, 2024. Det. Paul requested I review MVPD's case and help  
16 determine an investigative plan. In addition, MVPD requested I evaluate whether there were  
17 case-specific facts indicating Minor Victim was a potential crime victim. Beginning that day  
18 and continuing over the next two weeks, I read MVPD's reports, and participated in phone  
19 calls and meetings with MVPD regarding their investigation. I became familiar with the  
20 investigative facts and helped MVPD strategize their next steps.

21 6. Evidence in MVPD's case indicated Minor Victim had an adult male boyfriend  
22 known only as "Keith." The timeframe of Minor Victim's relationship with "Keith" was  
23 initially unclear. Investigators were not able to determine if "Keith" and Minor Victim were  
24 in contact with each other when Minor Victim ran away.

25 7. Information about "Keith" was very limited. MVPD's investigation identified  
26 "Keith" as an unconfirmed 30-year-old male that Minor Victim met on Omegle, a website I  
27 knew went offline in late 2023 and that the website had been accused of facilitating child  
28 abuse. MVPD interviewed several juveniles, who were acquainted with Minor Victim.

1 Many of them provided a general physical description of “Keith,” and they seemed to be  
2 describing the same person.

3 8. MVPD told me that Minor Victim’s cell phone was factory-reset by her mother  
4 just before Minor Victim ran away. This prevented law enforcement from extracting any  
5 forensic data from Minor Victim’s phone, meaning any recent communication between  
6 Minor Victim and “Keith” was inaccessible to investigators.

7 9. On or about January 31, 2024, Det. Paul called me and said MVPD identified  
8 “Keith.” MVPD interviewed a friend of Minor Victim, who stated “Keith” sometimes paid  
9 for Minor Victim’s Uber rides. After identifying a specific Uber ride paid for by “Keith,”  
10 MVPD served legal process to Uber requesting information on the person who funded that  
11 ride. Uber returned the following individual: KEITH FREERKSEN with an accompanying  
12 email address and cell phone number.

13 10. MVPD searched law enforcement databases for the phone number associated  
14 with Freerksens’s Uber account, which resolved to KEITH DANIEL FREERKSEN in South  
15 Haven, Michigan. MVPD provided Freerksen’s identifying information to me.

16 11. I ran initial records checks on Freerksen. I reviewed Freerksens’s criminal  
17 history, which showed he was a registered sex offender residing in South Haven, Michigan.  
18 Freerksen’s criminal history included a felony conviction for possession of child  
19 pornography in 2017. The FBI was able to identify Freerksen’s car through a records search.

20 12. Then, law enforcement officers searched license plate readers for Freerksen’s  
21 vehicle during the January 5, 2024, timeframe, which is when Minor Victim went missing.  
22 Freerksen’s vehicle registered on multiple license plate readers between Michigan and  
23 Washington during that period of time. Based on the pattern of the license plate reader hits,  
24 it appeared Freerksen traveled westbound through Illinois then Idaho on January 3, 2024,  
25 through January 5, 2024. It also appeared that Freerksen traveled eastbound from Idaho to  
26 Illinois from January 6, 2024, through January 8, 2024. These facts confirmed my belief that  
27 Freerksen traveled to Washington from Michigan, picked up Minor Victim, then drove back  
28 to his residence in Michigan.

1           13.    MVPD installed an emergency ping order on Freerksen's phone. The geo-  
2 location data placed the phone in the immediate vicinity of Freerksen's residence in South  
3 Haven, Michigan.

4           14.    I contacted law enforcement in Michigan with jurisdiction over Freerksen's  
5 residence. I spoke to Det. Lt. David Walker with Van Buren County Sheriff's Office and  
6 briefed him the investigation into Freerksen and his potential victimization of Minor Victim.  
7 I requested his department conduct an imminent welfare check on Freerksens's residence to  
8 determine if Minor Victim was inside. Det. Lt. Walker secured a search warrant for  
9 Freerksen's residence and assembled a search team.

10          15.    When Van Buren County Sheriff's Office executed the search warrant at  
11 Freerksen's house on January 31, 2024, they located Minor Victim inside. During a  
12 subsequent search of an outbuilding determined to house Minor Victim and Freerksen, law  
13 enforcement located a sex toy and lubricant, among other things.

14          16.    Other persons who resided on Freerksen's property were interviewed by law  
15 enforcement during the search. At least one of Freerksen's family members said Minor  
16 Victim and Freerksen were in a romantic relationship. Law enforcement located several  
17 articles of clothing that belonged to Minor Victim inside of Freerksen's property.

18          17.    Immediately after her recovery on January 31, 2024, Minor Victim was  
19 transported to the hospital for a SANE examination. During the exam, Minor Victim  
20 disclosed that Freerksen traveled to Washington, picked her up, and drove her back to  
21 Michigan. Minor Victim disclosed she and Freerksen had sex multiple times a day since  
22 then. Minor Victim approximated Freerksen sometimes had sex with her as often as ten  
23 times a day. Minor Victim defined these sex acts as inclusive of vaginal and oral  
24 penetration.

25          18.    On or about February 8, 2024, a detective with Van Buren County Sheriff's  
26 Office contacted me. The detective recently spoke to Minor Victim's mother. Minor Victim  
27 disclosed to her mother how Minor Victim and Freerksen had sex in a hotel in Idaho shortly  
28 after they left Washington.

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**III. CONCLUSION**

19. The affidavit and application are being presented by reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

20. Based on the above facts, I respectfully submit that there is probable cause to believe that KEITH DANIEL FREERKSEN did Travel with Intent to Engage in Sexual Acts with a Minor, in violation of Title 18, United States Code, Section 2423(b) .

  
SARA BLOND, Complainant  
Special Agent  
Federal Bureau of Investigation

The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone on this 25th day of March, 2024.

  
S. KATE VAUGHAN  
United States Magistrate Judge